## Case 1:21-cr-00158-JLT-SKO Document 45 Filed 11/14/22 Page 1 of 2 1 HEATHER E. WILLIAMS, CA Bar 122664 Federal Defender JAYA C. GUPTA, CA Bar 312138 2 Assistant Federal Defender 3 2300 Tulare St, Ste. 330 Fresno, CA 93721 Tel: (559) 487-5561 4 Fax: (559) 487-5950 5 Attorneys for Defendant RICHARD CHARLES THOMAS JR. 6 7 IN THE UNITED STATES DISTRICT COURT 8 9 FOR THE EASTERN DISTRICT OF CALIFORNIA 10 UNITED STATES OF AMERICA. No. 1:21-cr-00158-JLT-SKO 11 12 Plaintiff, MOTION TO WITHDRAW AS COUNSEL OF 13 v. RECORD AND APPOINT CJA COUNSEL 14 RICHARD CHARLES THOMAS JR., 15 Defendant. 16 17 Jaya C. Gupta, Assistant Federal Defender, and counsel of record in the above-captioned 18 case, hereby moves for an order allowing her to withdraw as counsel of record and for 19 appointment of new counsel to represent defendant RICHARD CHARLES THOMAS. As 20 grounds, she states: 21 1. The Federal Defender's Office was appointed to represent Richard Charles Thomas on 22 June 7, 2021, at his initial appearance on a criminal complaint. Dkt. #8. 23 2. At the time of appointment, the undersigned was an Assistant Federal Defender with the 24 Federal Defender's Office in Fresno. 25 3. The undersigned has taken a position with the Federal Defender's Office in the Central

District of California to be closer to her family and anticipates making the transition in

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late November 2022.

## Case 1:21-cr-00158-JLT-SKO Document 45 Filed 11/14/22 Page 2 of 2 4. As Mr. Thomas is still in need to counsel to represent him, our office has contacted CJA 1 panel attorney Daniel Harralson, who is available and willing to accept the appointment. 2 5. Accordingly, the undersigned requests that she be permitted to withdraw from the case, 3 and that new counsel, Daniel Harralson, be appointed. 4 5 Respectfully submitted, 6 DATED: November 14, 2021 /s/ Jaya C. Gupta 7 JAYÁ C. GUPTA Assistant Federal Defender 8 Attorneys for RICHARD CHARLES THOMAS JR. 9 10 11 12 13 ORDER 14 IT IS SO ORDERED that the Office of the Federal Defender may withdraw from its 15 representation of RICHARD CHARLES THOMAS JR., and that CJA panel counsel Daniel 16 Harralson shall be appointed. 17 IT IS SO ORDERED. 18 19 /s/Barbara A. McAuliffe Dated: **November 14, 2022** 20 UNITED STATES MAGISTRATE JUDGE 21 22 23 24 25 26 27 28

Thomas: Motion to Withdraw